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CITY OF BERKELEY, HARVEY TURECK

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Appearing *Pro Se*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

MARK HAINES,  
  
Plaintiff,  
  
vs.

DARYL B. BRAND, MFT, individually and in  
her official capacity; THE CITY OF  
BERKELEY, a municipality; BETH  
MEYERSON, in her official capacity;  
KAREN TRIBBLE, in her official capacity;  
DAVID WEE, LCSW, individually and in his  
official capacity; HARVEY S. TURECK,  
individually and in his official capacity; FRED  
MEDRANO, individually and in his official  
capacity; JANE DOE #1, individually and in  
her official capacity; and DOES #2 through 12,  
in their individual and official capacities,

Defendants.

NO. C11-01335 EMC

**STIPULATION AND [PROPOSED]  
ORDER GRANTING EXTENSION OF  
TIME FOR DEFENDANT HARVEY  
TURECK TO FILE RESPONSIVE  
PLEADING**

IT IS HEREBY STIPULATED by and between plaintiff Mark Haines, appearing *pro se*,  
and defendant Harvey Tureck (“defendant Tureck”), through the Berkeley City Attorney’s  
Office, to extend the time for defendant Tureck to file a responsive pleading from July 7, 2011 to  
July 22, 2011.

There is good cause for the stipulation to extend time as follows: defendant Tureck was served with the original Complaint on June 16, 2011, and the City of Berkeley received a copy of the original Complaint from the U.S. Marshall's Office on July 1, 2011. Plaintiff has filed a First Amended Complaint, which he provided to counsel for defendant Tureck and the City of Berkeley by email on July 1, 2011. This extension will provide defendant Tureck time to analyze and prepare a response to the First Amended Complaint. This extension will also allow for the filing of a joint responsive pleading.

Thus, the parties stipulate and agree that defendant Tureck's responsive pleading may be filed no later than July 22, 2011. The parties are not making this request for any improper purpose, including undue delay. Moreover, as noted above, neither party would suffer any prejudice as the parties have stipulated to this request.

SO STIPULATED.

Respectfully submitted:

ZACH COWAN, City Attorney  
KRISTY VAN HERICK, Deputy City Attorney

Dated: July 6, 2011.

By: \_\_\_\_\_/s/

KRISTY VAN HERICK, Deputy City Attorney  
Attorneys for Defendants City of Berkeley and  
Harvey Tureck

Respectfully submitted:

Dated: July 6, 2011.

By: \_\_\_\_\_/s/

MARK HAINES  
Plaintiff Appearing *Pro Se*

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: 7/7/11

